

**UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION**

JANE DOES 1-9,

Plaintiffs,

vs.

COLLINS MURPHY, SHARON HAMMONDS, BRENDA F. WATKINS, LIMESTONE UNIVERSITY, MG FREESITES, LTD., d/b/a PORNHUB.COM, MG FREESITES II LTD., MINDGEEK S.A.R.L., MINDGEEK USA, INC., MG BILLING LTD., and HAMMY MEDIA LTD. d/b/a XHAMSTER.COM, TRAFFICSTARS LTD., WISEBITS LTD, XHAMSTER IP HOLDINGS LTD, WISEBITS IP LTD.,

Defendants.

Case No.: 7:20-cv-00947

**NOTICE OF REQUEST FOR  
PROTECTION FROM COURT  
APPEARANCES**

JANE DOE,

Plaintiff,

vs.

LIMESTONE UNIVERSITY F/K/A LIMESTONE COLLEGE, COLLINS MURPHY, MG FREESITES, LTD., d/b/a PORNHUB.COM, and HAMMY MEDIA, LTD. d/b/a XHAMSTER.COM,

Defendants.

Case No.: 7:21-cv-03193

**NOTICE OF REQUEST FOR  
PROTECTION FROM COURT  
APPEARANCES**

Evan Fray-Witzer, Valentin D. Gurvits, and Frank Scardino, counsel for Defendants Hammy Media, LTD, Trafficstars LTD, and Wisebits IP LTD, respectfully request this Honorable Court's protection from being called to hearings or other Court Appearances in this matter on May 29, 2024, June 13, 2024, June 18, 2024, June 21, 2024 through June 30, 2024,

July 16, 2024 through July 17, 2024, and July 29, 2024 through July 31, 2024 during which time counsel are previously-scheduled to attend the graduation of one of counsel's children and/or will be participating in a previously-scheduled family vacation.

Additionally, the undersigned counsel, Hannah Rogers Metcalfe, respectfully requests this Honorable Court's protection from being called to hearings or other Court Appearances in this matter from May 28, 2024 through May 31, 2024 during which time I am scheduled to appear as counsel in a previously-scheduled date certain jury trial in South Carolina Circuit Court and from July 5, 2024 through July 12, 2024, due to a previously-planned family vacation.

Respectfully submitted,

s/ Hannah Rogers Metcalfe  
Hannah Rogers Metcalfe, Fed. I.D.# 9943  
Metcalfe & Atkinson, LLC  
1395 South Church Street  
Greenville, South Carolina 29605  
Telephone: (864) 214-2319  
Facsimile: (864) 214-3067  
[hmetcalfe@malawfirmsc.com](mailto:hmetcalfe@malawfirmsc.com)

Evan Fray-Witzer (*pro hac vice*)  
CIAMPA FRAY-WITZER, LLP  
20 Park Plaza, Suite 505  
Boston, Massachusetts 02116  
Telephone: 617-426-0000  
Facsimile: 617-423-4855  
[Evan@CFWLegal.com](mailto:Evan@CFWLegal.com)

Valentin D. Gurvits (*pro hac vice*)  
Frank Scardino (*pro hac vice*)  
BOSTON LAW GROUP, PC  
825 Beacon Street, Suite 20  
Newton Centre, Massachusetts 02459  
Telephone: 617-928-1804  
Facsimile: 617-928-1802

vgurvits@bostonlawgroup.com  
frank@bostonlawgroup.com

*Attorney for Hammy Media, LTD, Trafficstars LTD,  
and Wisebits IP LTD*

May 15, 2024  
Greenville, South Carolina